

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America,  
v.  
John Angelo, et al.

Case No. 20-CR-20599

Honorable Matthew F. Leitman

**SUBPOENA TO TESTIFY AT A HEARING OR TRIAL IN A CRIMINAL CASE**

To: Auto Accident Attorneys PLLC

**YOU ARE COMMANDED** to appear in the United States district court at the time, date, and place shown below to testify in this criminal case. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: Theodore Levin U.S. Courthouse  
231 W. Lafayette Blvd, CR 207  
Detroit MI 448226

Date and Time: October 17, 2023 at 9:00 am

You must also bring with you the following documents, electronically stored information, or objects (*blank if not applicable*): \*Documents and Testimony\*

\*Please deliver the Documents and Data requested in Attachment A via Electronic Production to the Flint USAO by September 22, 2023

To the extent data or documents that is responsive to this request are withheld because they may be subject to a claim of privilege by the relevant entity, please identify the data or documents withheld for privilege by Bates Number (as described in Attachment A) so we can address the privilege claim in a timely fashion.

KINIKIA D. ESSIX, CLERK OF COURT

  
Signature of Clerk or Deputy Clerk



Date: August 25, 2023

The name, address, e-mail, and telephone number of the attorney representing United States of America,  
who requests this subpoena, are: (name of party)

MM DOJ Trial Atty Mark McDonald, U.S. Attorney's Office  
210 Federal Building, 600 Church Street  
Flint, MI 48502  
202-305-2672, 810-766-5023  
mark.s.mcdonald@usdoj.gov

Case No. 20-CR-20599

**PROOF OF SERVICE**

This subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

☐ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_

\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of

\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

**CERTIFICATE OF AUTHENTICITY  
OF  
BUSINESS RECORDS**

I, \_\_\_\_\_, attest that:

I am employed by \_\_\_\_\_;  
that my official title is \_\_\_\_\_ and that I  
have been appointed the keeper of the attached records.

Each of the attached records is the original or a duplicate of the original  
records in the custody of \_\_\_\_\_.

I further state that:

- (a) these records were made, at or near the time of the occurrence of the matters set forth, by (or from information transmitted by) a person with knowledge of those matters;
- (b) these records were kept in the course of regularly conducted business activity; and
- (c) it was the regular practice of this business to make such records.

I certify that the foregoing is true and accurate, to the best of my knowledge and belief.

Executed on \_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Location

## **ATTACHMENT A**

A) UNREDACTED COPIES of all business records, invoices sent/received, billing records, employment records, advertising agreements, marketing agreements, employment contracts, wages earned, hours worked, agency fees earned, shipping records, collection records, or any other business records pertaining to funds delivered to the following business entities from January 1, 2014, to the present [Please do not provide documents you understand to be protected by Attorney Client Privilege, but please do provide a Privilege Log so we may address Privilege issues with the court]:

- 4 Health Management LLC (EIN 81-5013189/80-2063970)
- 411 Help (EIN 82-1881100)
- 4 Transport (EIN 81-1983004)
- Gravity Imaging LLC (EIN 47-4959383)
- Greater Lakes Ambulatory Surgical Center (EIN 26-3899267)
- J&A Consultants, Incorporated (EIN 47-3013842)
- NJC Marketing, LLC (EIN 27-3565988)
- Pacific Marketing & Advertising (EIN 27-4399830)
- Robin Street Consultants, LLC (EIN: 46-5101647)
- Standard Care Inc./Standard Medicals Inc. (EIN 57-9089183)

### Electronic Production Specifications

1. Relativity formatted .dat load file containing the metadata fields detailed in the attached field list for each database record.
2. Relativity formatted .opt image cross reference load file.
3. Document level extracted text files named with the Bates begin number. If text cannot be extracted, those documents are to be OCR'd. Do not include extracted or OCR text in the .dat file.
4. Group IV single page .tif or .jpg images AND native files.
5. Native electronic files are to be produced in addition to Tiff or JPEG images. The native file is to be named by the Bates number of the first page of the document. If a file cannot be rendered to tiff then a slip-sheet image is to be produced and Bates endorsed. The slip-sheet should contain the Original Path and Original File Name.
6. Electronic data such as relational database systems, legacy systems, voicemail systems, or other non-standard type electronic data should be discussed before producing.
7. Deduplication processing specifications should be discussed with the Prosecution Team before proceeding.
8. Electronic files that cannot be processed will be listed on an exception report and the report is to be provided.
9. Archived or compressed files (e.g., ZIP, TAR, ISO) shall be decompressed and processed.
10. Privilege log(s) are to be produced in an electronic format such as MS Excel.